



Christopher M. Lucca

Attorney at Law

Direct Dial: 215.864.8073

Direct Fax: 215.864.0062

clucca@conradobrien.com

November 24, 2021

Via ECF filing

The Honorable Christine P. O'Hearn
U.S. District Judge, District of New Jersey
Mitchell H. Cohen Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

The Honorable Sharon A. King
U.S. Magistrate Judge, District of New Jersey
Mitchell H. Cohen Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

RE: *Renee Handley v. Rowan Univ. and Noah Weinstein (No. 21-cv-16889)*
Stipulation regarding Amended Complaint and Response Deadline

Dear Judge O'Hearn and Judge King,

I represent Defendant, Noah Weinstein, in the above-referenced matter. Prior to this matter being re-assigned to Judge O'Hearn, the parties had exchanged pre-motion conference letters pursuant to Judge Bumb's procedures. As a result of these letters, Plaintiff recently indicated to Defendants her intention to file an amended complaint. On November 22, 2021, Judge O'Hearn entered an order granting Defendants leave to file motions to dismiss. (ECF No. 21.)

To streamline potential motion practice and clarify the parties' deadlines, the parties have entered into a stipulation related to the filing of Plaintiff's Amended Complaint and Defendants' deadline to respond to Plaintiff's Amended Complaint. That stipulation is enclosed for consideration by your Honors. The parties jointly and respectfully request that the stipulation be entered by the Court.

Respectfully,

s/ Christopher M. Lucca

Christopher M. Lucca, Esq.

Patricia M. Hamill, Esq.

Counsel for Defendant Noah Weinstein

cc: All counsel of record via ECF
Enclosure

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RENEE HANDLEY,
in her individual capacity,

Plaintiff,

V.

ROWAN UNIVERSITY and
NOAH WEINSTEIN, in his individual
capacity,

Defendants.

[illegible]

**STIPULATION AND ORDER REGARDING PLAINTIFF FILING AN AMENDED
COMPLAINT AND DEFENDANTS' RESPONSIVE PLEADING DEADLINE**

It is hereby stipulated between Renee Handley (“Plaintiff”), Rowan University (“Rowan”), and Noah Weinstein (“Mr. Weinstein”) (Rowan and Mr. Weinstein together, “Defendants”), by their attorneys, as follows:

1. Plaintiff filed her Complaint on September 14, 2021. (ECF No. 1.)
2. Per the Honorable Renee Marie Bumb’s procedures, Defendants filed pre-motion conference letters identifying alleged deficiencies in Plaintiff’s Complaint. (ECF Nos. 7 and 13.)
3. Plaintiff intends to file an Amended Complaint removing Mr. Weinstein from the ADA, Rehabilitation Act, and Title IX counts.
4. To streamline potential motion practice and clarify the appropriate filing deadlines, Defendants consent to Plaintiff filing her Amended Complaint by December 7, 2021.

5. In doing so, Defendants expressly preserve all Rule 12 defenses, objections, and motions to Plaintiff's Amended Complaint.

6. Defendants' deadline to answer, move, or otherwise respond to Plaintiff's Amended Complaint is January 17, 2022.

s/ Bradley Flynn

Bradley Flynn, Esq.

Montgomery Law, LLC

1420 Locust Street

Suite 420

Philadelphia, PA 19102

Counsel for Plaintiff

s/ James Keller

James A. Keller, Esq.

Saul Ewing Arnstein &

Lehr LLP

1500 Market St., 38th West

Philadelphia, PA 19102

Counsel for Rowan

s/ Christopher Lucca

Christopher M. Lucca, Esq.

Conrad O'Brien, P.C.

1500 Market St.

Suite 3900, West Tower

Philadelphia, PA 19102

Counsel for Mr. Weinstein

Approved by the Court:

J.